

ATTACHMENT C

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

GOOGLE, INC.,

Plaintiff,

v.

JIM HOOD, ATTORNEY GENERAL OF
THE STATE OF MISSISSIPPI, IN HIS
OFFICIAL CAPACITY,

Defendant.

No. 3:14-cv-981-HTW-LRA

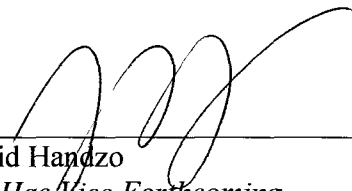
**DECLARATION OF ATTORNEY DAVID HANDZO
IN SUPPORT OF MOTION TO QUASH RULE 45 SUBPOENA**

I, David Handzo, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a partner at Jenner & Block LLP in Washington, D.C., and familiar with the documents in this litigation.
2. Attached as Exhibit A is a true and correct copy of pages 35-39 and 76-79 of the October 8, 2015 deposition of Brian Cohen.
3. Attached as Exhibit B is a true and correct copy of the letter sent from the MPAA's General Counsel, Steven B. Fabrizio, to the Mississippi Attorney General on December 16, 2014.
4. Attached as Exhibit C is a true and correct copy of the letter sent from the MPAA's General Counsel, Steven B. Fabrizio, to the Mississippi Attorney General on January 14, 2015.

Pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury that the foregoing is true and correct, to the best of my knowledge.

Executed on March 8, 2016 in Washington, D.C.



David Handzo
Pro Hac Vice Forthcoming

EXHIBIT A

1
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
4 NORTHERN DIVISION
5

6 GOOGLE, INC.) No.
Plaintiff) 3:14-cv-981-HTW-LRA
7 vs.)
JIM HOOD, ATTORNEY)
8 GENERAL OF THE STATE OF)
MISSISSIPPI, IN HIS)
9 OFFICIAL CAPACITY)
Defendant)
10
11
12
13

14 Videotaped Deposition of Brian Cohen
15 Washington, D.C.
16 October 8, 2015
17 9:06 a.m.
18
19
20
21
22
23

24 Reported by: Bonnie L. Russo
25 Job No. 2146100

1 A. Define "main focus"?

2 Q. Was Google a focus of the AG working
3 group?

4 A. Yes.

5 Q. What other companies were a focus of
6 the AG working group?

7 A. Any companies in the search engine
8 universe.

9 Q. Any company in the search engine
10 universe. Please list them, that you focused
11 on in those calls.

12 A. Define "focus." I mean...

13 Q. I'm not trying to play a game. I
14 mean, I'm trying --

15 A. Yeah.

16 Q. -- to figure out what you talked
17 about on those calls. You tell me.

18 A. We talked about strategies to combat
19 intellectual property theft that related to
20 search engines, including Google.

21 Q. The name of the call was the AG
22 working group, right?

23 A. Yes.

24 Q. So you weren't talking about
25 strategies at large, you were talking about

1 some sort of strategy that involved Attorneys'
2 General, right?

3 MR. ROMMEL: Objection. Misstates
4 evidence.

5 THE WITNESS: Can you repeat the
6 question?

7 BY MR. RUBIN:

8 Q. Sure.

9 You weren't talking about strategies
10 written large to combat issues. You were
11 talking about strategies involving Attorneys
12 General; isn't that right?

13 MR. ROMMEL: Objection.

14 THE WITNESS: No. No, that's not
15 right.

16 BY MR. RUBIN:

17 Q. Then, please describe to me the
18 strategies that were discussed on those calls.

19 MR. HANDZO: And let me just
20 interject because this has a potential to get
21 into legal strategies and legal advice, so I
22 don't have any problem with your answering with
23 respect to general business strategies. To the
24 extent that there was legal advice on the
25 phone -- on these calls, I would object if that

1 invades the MPAA provision.

2 MR. RUBIN: There -- as described to
3 me, there is no attorney-client privileged
4 relationship listed on that call, as that would
5 be help by the MPAA.

6 MR. HANDZO: Well, I don't agree
7 with your characterization, but my point to the
8 witness is if there are legal strategies
9 involved, whether they were coming from lawyers
10 directly or whether they were being repeated by
11 people on the call to talk to the lawyers, I
12 would object to any discussion of legal
13 strategy as opposed to business strategy.

14 THE WITNESS: And you -- you did jog
15 my memory. Ben Sheffner was also on those
16 calls.

17 BY MR. RUBIN:

18 Q. Okay. What strategies were
19 discussed on those calls?

20 MR. HANDZO: And same objection.

21 THE WITNESS: There were different
22 strategies discussed generally to compel
23 companies, such as Google, to change behavior,
24 to prevent the theft of intellectual property.
25 Some of those strategies entailed legislative,

1 some of them were legal, as you heard, some of
2 them were simply ways to compel stakeholders to
3 come to the table to have discussions about
4 voluntary actions.

5 Q. Did all of the strategies discussed
6 on those calls involve, in some way, attorneys
7 general?

8 A. No.

9 Q. So the AG working group meandered
10 from its title?

11 A. Yes.

12 Q. What else -- what, beyond the use of
13 attorneys general, were considered as
14 strategies to compel search engines to change
15 their behavior?

16 A. Can you repeat the question?

17 Q. What else, beyond the use of
18 attorneys general, were considered as
19 strategies to compel search engines to change
20 their behavior?

21 A. Legislative.

22 Q. What sort of legislative strategies?

23 A. Strategies not too dissimilar from
24 the strategies that were tried previously.

25 Q. What strategies were tried

1 previously?

2 A. The Protect IP Act and Stop Online
3 Piracy Act.

4 Q. You're referring to what's also
5 known as SOPA and PIPA?

6 A. Yes.

7 Q. And when you say, "discussions of
8 attempting," you're talking efforts to revive
9 SOPA and PIPA?

10 A. No.

11 Q. Then, please, explain.

12 A. General legislative brainstorming to
13 get at the root cause of the theft of
14 intellectual property that were similar to some
15 of the components of that legislation,
16 SOPA/PIPA, but would be entirely new
17 opportunities to address the problem.

18 Q. Utilizing different legislative
19 means under new names to achieve the same end?

20 A. To achieve -- no.

21 To achieve the end of forwarding
22 intellectual property theft and piracy.

23 Q. Did you discuss site blocking on
24 those calls?

25 A. Yes.

1 got there in June of 2011?

2 A. And, again, you're asking if MPAA
3 was already doing what?

4 Q. Was already working with State's
5 attorneys general to -- with respect to
6 Google's practices?

7 MR. ROMMEL: Objection. Asked and
8 answered, and calls for speculation.

9 THE WITNESS: They were already
10 working with State's attorneys general with
11 re -- with respect to intellectual property
12 theft and piracy.

13 BY MR. RUBIN:

14 Q. I'm asking specifically with respect
15 to Google?

16 A. I don't know.

17 Q. When you took your position in 2012,
18 were the states already working with the states
19 -- was the MPAA already working with the states
20 with respect to Google, specifically?

21 MR. DAVIS: Objection. Form.

22 THE WITNESS: I don't know.

23 BY MR. RUBIN:

24 Q. You don't know because you didn't
25 have access to that information at the MPAA, or

1 because you don't recall?

2 A. I didn't have access to that
3 information at the MPAA. I was not part of the
4 MPAA leadership. I was not setting policy or
5 strategy. I was there to implement, so I
6 don't -- I'm not privy to conversations.

7 Q. Who would know the answer to that
8 question?

9 A. Vans.

10 Q. Who else would know?

11 A. I don't know.

12 Q. Did Vans set that sort of strategy
13 at the MPAA by himself?

14 A. I don't know.

15 Q. Have you ever heard the term
16 "Project Goliath"?

17 A. Yes.

18 Q. What is Project Goliath?

19 A. General overarching strategy with
20 regards to Google.

21 Q. Can you describe that general
22 overarching strategy?

23 A. No.

24 Q. What did you understand Project
25 Goliath to entail?

1 A. General overarching strategy with
2 regards to Google.

3 Q. Whose strategy?

4 A. The MPAA's.

5 Q. Who developed the strategy?

6 A. I don't know.

7 Q. Who coined the term "Project
8 Goliath"?

9 A. I don't know.

10 Q. Who would know?

11 A. I don't know.

12 Q. Who is the expert in Project
13 Goliath?

14 A. I don't know.

15 Q. Whose baby was Project Goliath?

16 MR. ROMMEL: Objection.

17 MR. DAVIS: Objection to form.

18 THE WITNESS: I don't know.

19 BY MR. RUBIN:

20 Q. Who would know?

21 A. I don't know.

22 MR. ROMMEL: Objection. Calls for
23 speculation.

24 BY MR. RUBIN:

25 Q. Who's in charge of the MPAA?

1 A. Chris Dodd.

2 Q. And all decisions of consequence are
3 run by Chris Dodd?

4 MR. DAVIS: Objection.

5 MR. ROMMEL: Objection. Lacks
6 foundation.

7 THE WITNESS: I don't know.

8 BY MR. RUBIN:

9 Q. When did you first hear the term
10 "Project Goliath"?

11 A. It was towards the end of my tenure
12 there. I don't recall exactly. You know, I --
13 I finished around April 2014. So it was
14 towards the end, but I can't tell you the
15 specific date.

16 Q. Was the term "Project Goliath" ever
17 used on the AG working group calls?

18 A. I don't know.

19 Q. Did you ever hear anyone else use
20 the term?

21 A. Yes.

22 Q. Who did you hear it from?

23 A. General counsel at MPAA, Steve
24 Fabrizio.

25 Q. In what context?

EXHIBIT B



MOTION PICTURE ASSOCIATION
OF AMERICA, INC.
1600 EYE STREET, NORTHWEST
WASHINGTON, D.C. 20006
(202) 293-1966

Steven B. Fabrizio
Senior Executive Vice President
& Global General Counsel
202-378-9120
Steven_Fabrizio@mpaa.org

December 16, 2014

Attorney General Jim Hood
Mississippi Attorney General's Office
P.O. Box 220
Jackson, MS 39205

Dear Attorney General Hood:

Thank you for your request for information concerning a recent announcement by Google regarding the impact of copyright removal notices on search rankings. As you know, MPAA and its motion picture studio members believe that Google Search facilitates the unlawful theft of content when pirate sites appear in its search results (and in particular the first few pages).¹ We appreciate the opportunity to share with you our preliminary analysis of how the change to Google's search algorithm has affected the accessibility of stolen content on the Internet.

Overview

Google first announced that it would demote known piracy sites in its search results in August of 2012. It reported that it would do so by incorporating copyright removal notices for websites in its search ranking algorithm. In practice, however, very little changed. Notorious piracy sites continued to regularly appear at or near the top of search results – even in response to search queries not expressly seeking pirated content. It was business as usual.

Several weeks ago, Google again announced a change in its search algorithm. Google claimed to have “improved and refined the DMCA demotion signal in search results,” to help users find

¹ MPAA's members include: Walt Disney Studios Motion Pictures; Paramount Pictures Corporation; Sony Pictures Entertainment Inc.; Twentieth Century Fox Film Corporation; Universal City Studios LLC; and Warner Bros. Entertainment Inc.

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legitimate sources of content more easily.² Google made this change without any consultation with, or input from, rights holders. Nevertheless, MPAA and its member companies view actions taken by any search engine to promote legitimate sources of content and demote unlawful sites to be positive, and we told Google as much directly. Our initial analysis shows that, for certain types of search queries, the recent algorithm change does appear to demote the search rankings of certain types of sites with an exceptionally high number of DMCA notices. Overall, however, our initial analysis shows that the impact of the algorithm change is limited and ultimately ineffective.

At bottom, this adjustment in Google's ranking algorithm fails to address the core problem: Pirated content continues to appear at or near the top of Google's search results, even when users may be looking for legitimate sources of copyrighted works. As a general matter, Google's change to its algorithm does not change *whether* sites offering pirated content are highly ranked in search results. Instead, it simply changes *which* piracy sites appear at or near the top of search results. While a "top" piracy site, with hundreds of thousands of DMCA notices, may now be less likely to be ranked as highly in search results, other sites – even those owned and operated by the same individuals (and with many copyright notices themselves) – simply appear in its place. Moreover, depending on the search terms used, many of the "top" piracy sites – the very sites Google claims to have demoted – remain at the top of the search rankings.

The failure of the algorithm change to actually hamper content theft demonstrates the weakness in relying solely upon DMCA notices to demote websites. Any algorithm change that relies only on the volume of notices, rather than the content of the site, will be unlikely to meaningfully combat piracy. Such a system might require months of notice sending – and months of unchecked infringement – before the algorithm change has any impact at all. Moreover, it is, unfortunately, far too easy for piracy sites to take actions to avoid demotion. For example, with a simple change in domain name (*e.g.*, from ".com" to ".to"), a site can "reset" its DMCA count to zero and rise to the top of Google's search results. A more robust approach will be necessary to meaningfully, and finally, end Google's facilitation of the theft of content.

Analysis of Google's New Algorithm

We continue our analysis of the changes Google has made, but we thought it would be helpful to provide you some real-world examples of the impact, or lack thereof, of Google's change.³ First, as we illustrate below, even when users search for content without seeking out piracy sites, sites peddling pirated content continue to appear at or near the top of search results. And these illegal sources of content regularly appear above legal sources in Google's organic search results. Second, while some "top" piracy sites now seem to be less likely to appear at the top of the results for certain search queries, they simply have been replaced by other piracy sites. This has created a boon for lesser-known sites, which are now benefiting from their high search-result

² How Google Fights Piracy, at 18 (Oct. 17, 2014), <https://drive.google.com/file/d/0BwxyRPFduTN2NmdYdGdJQnFTeTA/view>.

³ The examples used in this letter illustrate how Google Search continues to facilitate theft of copyrighted content, and that pirated content continues to appear at or near the top of Google's search results. Of course, the precise results to identical search queries will vary from user-to-user and over time.

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rankings through increased traffic to their sites, amply demonstrating how Google can propel piracy sites to popularity. Third, simple modifications of the user search query can result in prominent piracy sites continuing to appear at the top of search results. Therefore, despite Google's change to the algorithm, the result for copyright owners is the same: well-known piracy sites remain prominently placed in search results, and the theft of intellectual property continues.

We provide some illustrations of these points below.

Generic Search Terms Result in Piracy Links at the Top of Search Results

From our internal analyses, search phrases that include the title of a copyrighted work (for example, "Expendables") when combined with innocuous search terms not specifically directed at piracy (for example, "watch" or "download") continue to return a substantial number of piracy sites in the top twenty search results. Often these piracy sites appear in the top five results.

For example, in its own piracy report, Google highlighted that the results for certain search queries are now accompanied by paid advertisements for authorized sources of the content.⁴ While this is true, Google failed to note that the organic search results appearing immediately *beneath* those paid advertisements commonly have links to pirated content as their top results. For example, a recent search of "download Captain America The Winter Soldier" returned piracy sites in the top two results, before any legitimate sources for the content:

⁴ See How Google Fights Piracy, at 20 (Oct. 17, 2014), <https://drive.google.com/file/d/0BwxyRPFduTN2NmdYdGdJQnFTeTA/view>. Notably, however, this is true only for searches for movies – not TV shows. Additionally, it appears that Google has also only implemented the change on searches conducted through Google.com, not its foreign search platforms.

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download Captain America The Winter Soldier





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About 2,560,000 results (0.41 seconds)

 Watch Captain America: The Winter S... ⓘ

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 VUDU from \$14.99

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Captain America: The Winter Soldier (2014) BRRip Full Movie Download Free
Mp4,HD Mp4 and High Quality Mp4 For Mobile,PC or Tablets,Mkv,Avi,3gp Full ...

A search for “22 Jump Street download” returned similar results.

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Google 22 Jump Street download

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About 58,400,000 results (0.37 seconds)

Watch 22 Jump Street

Google Play from \$3.99

VUDU from \$3.99

Amazon from \$3.99



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The pattern is clear. Even when sites offering legal, licensed versions of the content are available, Google's organic search results continue to point users toward illegal, pirated content. As a result, even when ads highlight the legal availability of content for purchase, Google simultaneously promotes the same content as available to "download free" through unlawful sites that regularly appear in the prominent positions in its search results.

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The screenshot shows a Google search for "star trek into darkness online". The search bar contains the text "star trek into darkness online" and a magnifying glass icon. Below the search bar are tabs for "Web", "Videos", "Shopping", "News", "Images", "More", and "Search tools". The results show "About 2,960,000 results (0.46 seconds)".

Under the "Web" tab, there are four results:

- Watch Star Trek Into Darkness** (with an information icon)
- Google Play from \$9.99**
- VUDU from \$9.99**
- Netflix with free trial**

To the right of these results is a movie poster for "Star Trek Into Darkness".

Below the legitimate results, there are two search results enclosed in boxes, which are piracy sites:

- Star Trek Into Darkness (2013) HD Watch Online Free ...**
onlinemovies.pro/star-trek-into-darkness-2013-hd/ ▼
Star Trek Into Darkness (2013) HD Watch Online For Free on OnlineMovies.PRO
 Director: J.J. Abrams Writers: Roberto Orci, Alex Kurtzman, Stars: Chris Pine ...
- Watch Movie Star Trek Into Darkness (2013) Online Free ...**
www.solarmovie.ws/watch-star-trek-into-darkness-2013-online.html ▼
 Watch Movie **Star Trek Into Darkness (2013) Online** Free SolarMovie - After the crew of the Enterprise find an unstoppable force of terror from within their own ...

Google also continues to direct users to piracy sites in response to generic searches for content. Users who are looking for legitimate sources to download or stream movies can end up with recommendations from Google for piracy sites. For example, a user searching for “watch movies online” might expect to be directed to legitimate websites like Netflix or Hulu. Instead, the top five search results on Google are for well-known piracy sites. Two of these sites, Putlocker and SolarMovie, have been subject to thousands of copyright removal requests. The remaining three results in the top five have each been subject to several hundred removal notices. The first legitimate source for movies – Disney Movies Anywhere – only appears as the sixth-most-relevant search result.

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Google watch movies online

Web Videos Shopping Apps News More ▾ Search tools

About 656,000,000 results (0.33 seconds)

Watch Movies Online Free

[watchmovies-online.ch/](#) ▾

Watch Movies Online Free, New Movies Streaming , Watch your favorite movies online free on Firedrive.

Putlocker - Watch Movies Online Free

[putlocker.is/](#) ▾

Putlocker - **Watch Movies Online Free**. Watch your favorite movies online free on Putlocker. Discover thousands of latest movies online.

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14831 items - **watch movies online**, **watch free movies online**, online movies, latest movies, **download movies**, free online movie downloads, film downloads, free ...

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Moreover, the volume of illegal sites appearing in response to such queries is truly staggering. In a search for “streaming film,” all ten of Google’s top ten organic results – 100% – were links to infringing sites. In response to a search for “download movies for free,” eight of the top ten results were infringing.

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Google 

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About 162,000,000 results (0.18 seconds)

Tip: Search for **English** results only. You can specify your search language in Preferences

Films « Comedie « Streaming VF - Stream Complet
[streamcomplet.com/film/comedie/](#) ▾ Translate this page
 La Course au jouet 2: 6 362. Idiocracy: 61 416. Roland Magdane: Rire! 16 747. Luna
 Un Tigre croc-mignon: 27 166. Le Noël où tout a changé: 54 416.
 Comedie - 20 - The Other Woman - Page 6

Film en streaming, regarder film en direct, streaming vf ...
[sokrostream.com/](#) ▾ Translate this page
 film en streaming, **streaming film**, film gratuit, film streaming gratuit, regarder film,
 regarder film streaming
 Captain America, le soldat de l'... - Godzilla - Noël - Blackout Total

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[filmstreamvk.com/](#) ▾
 streaming vf, film streaming, **streaming film**, film en streaming, streaming vk, films
streaming, film stream vf, regarder film **streaming**, film complet,

Film Streaming in Alta Definizione Senza Limiti Gratis
[filmstream.me/](#) ▾ Translate this page
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 possibile guardare **film** e serie tv sul tuo iPad e iPhone. Offriamo circa 10.000 ...

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About 804,000,000 results (0.27 seconds)

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Watch Free M
No Signups. f

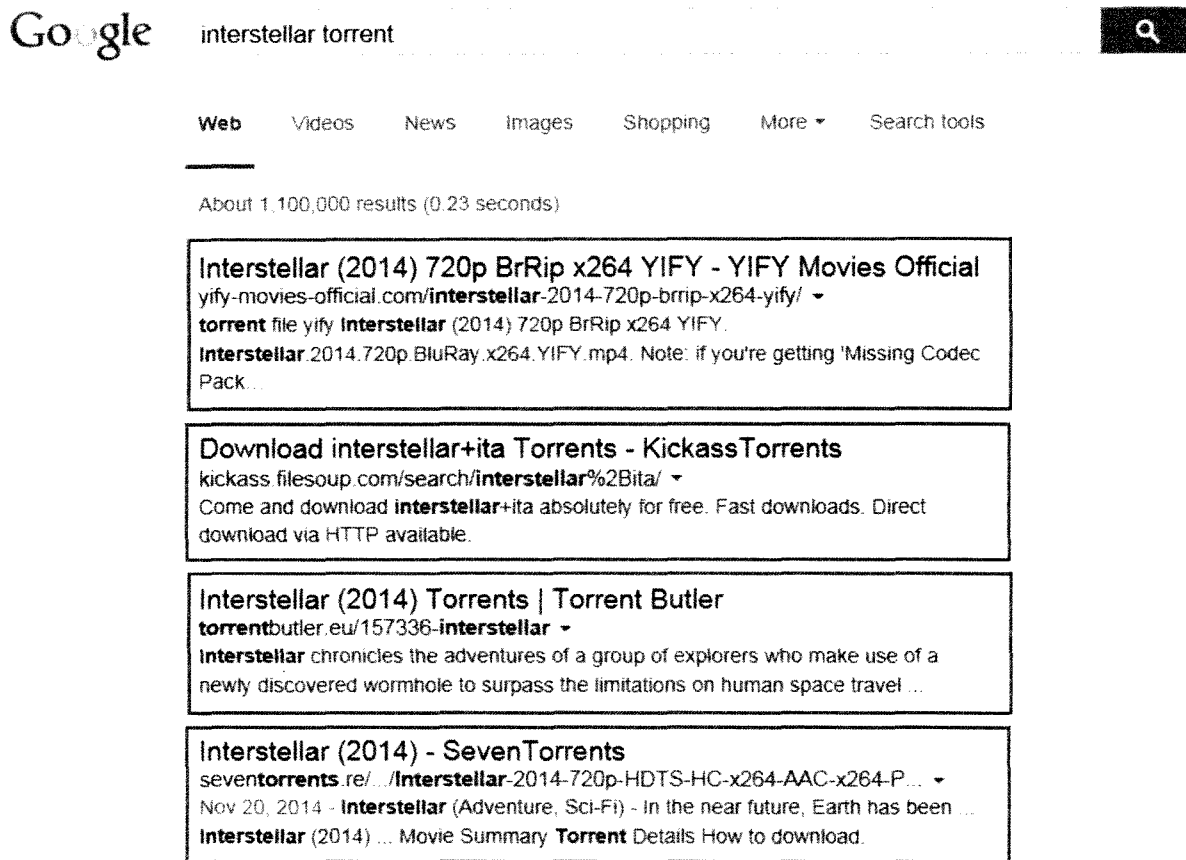
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Lesser-Known Piracy Sites Are Reaping Benefits from the Algorithm Change

We have seen similar results with respect to searches that are closely associated with piracy. Users who seek out copyrighted works using piracy-related search terms (for example, “torrent” or “piratebay”) will find that Google’s algorithm adjustment does little to impede their access to pirated content. In the example below, all of the top-ranking sites purport to offer illegal copies of a movie that is still in theaters.



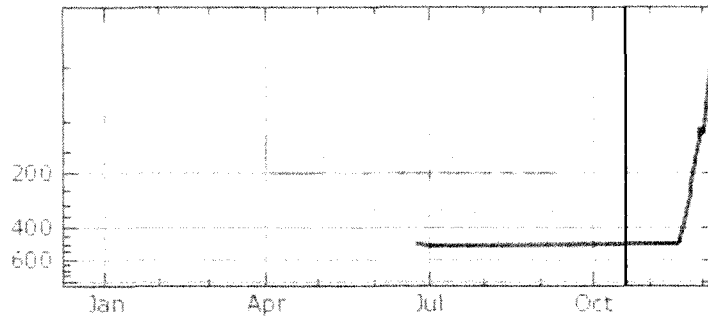
In the search results for many queries like the ones shown above, the top-ranked sites have fewer associated DMCA notices than the websites that would have appeared in previous months. But, of course, this does little to impede piracy. Users are still directed to sites offering illegal content.

This has, naturally, been a great boon to lesser-known piracy sites, which offer essentially the same infringing content and therefore can be just as damaging as better-known sites. Since the mid-October algorithm change, these lesser-known websites are now appearing at the top of Google’s search results and are enjoying increased traffic (and revenues) as a result of the change. A few simple graphs illustrate how lesser-known piracy sites have benefited from Google’s algorithm change. Since October, sites like kickass.so, filesoup.com, and yify-movies-

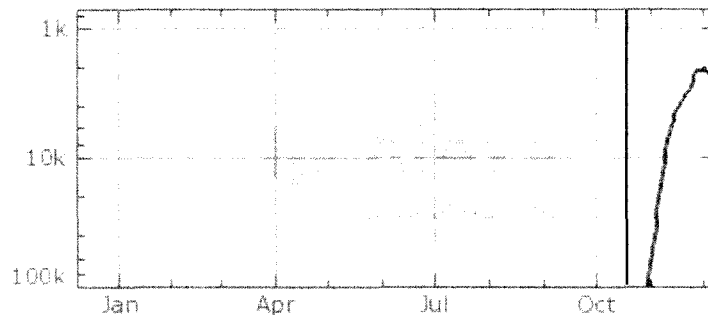
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official.com – some of which appear in examples in this letter – have seen spikes in popularity, measured by traffic to the sites.⁵

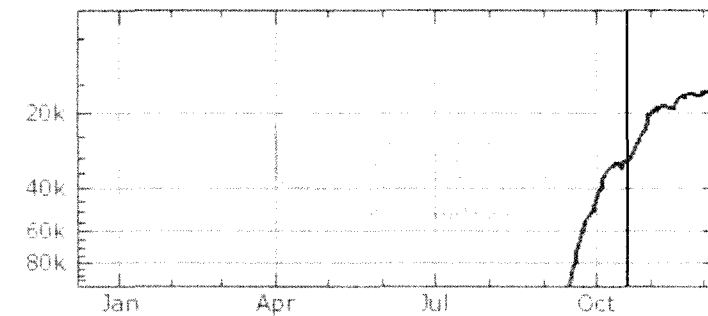
kickass.so



filesoup.com



yify-movies-official.com



These graphs confirm the essential role that Google plays in generating traffic to content piracy sites. With one change in the algorithm, different piracy sites appear at the top of search results, and those domains immediately experience massive spikes in visitors.

It is unsurprising that search rankings have such a significant impact on the volume of traffic to piracy sites. A recent study conducted by researchers at Carnegie Mellon University revealed that the presence and ranking of piracy sites in search results strongly affects whether users access pirated content. When legal sites are promoted in search results, users are more likely to visit sites offering legitimate content. Conversely, when pirate sites are highly ranked in search

⁵ The graphs demonstrate the popularity of websites over time, as measured by Alexa. The Y-axis reflects the ranking of a site by popularity, with lower numbers correlating to more popular websites. A site that ranks “600” is the 600th most-visited site on the Internet. A site with a ranking of “100k” is the 100,000th most-visited site.

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results, users are more likely to access stolen content.⁶ The lesson is clear: Google is vital to the success and survival of websites offering pirated content.

Top Piracy Sites Appear in Response to Certain Queries

Notably, even after the algorithm change, not all of the piracy sites appearing at the top of Google's search results are lesser known piracy sites. Although highly-ranked sites are now less likely to have 50,000 or 100,000 DMCA takedown notices, well-known piracy sites still appear.

The algorithm change appears to have affected site rankings for some types of piracy sites more than others. "Torrent" sites appear to be more heavily impacted by the algorithm change than other sites like "cyberlocker" websites. This dynamic is understandable given Google's exclusive reliance on the volume of DMCA notices for demotion. Torrent sites by nature of their architecture tend to host many more links and, as a result, will be the subject of many more DMCA notices. Cyberlocker sites, in contrast, do not organize links right on their sites in the same way and thus tend to have fewer DMCA notices to impact their search rankings. From the perspective of the movie industry, however, cyberlocker sites are just as problematic – if not more so – than torrent sites.

A recent search for "watch gravity" returned as the top three organic search results links to Putlocker, Megashare, and SolarMovie – all sites that are well-known to offer pirated content. The family of Putlocker domains have been the subject of over 350,000 DMCA notices.⁷ The specific domain listed below, putlocker.is, has itself accumulated almost 1,500 removal notices since June 2014. Megashare is similarly dominant in the theft of content. Google has received over 6,800 removal notices for megashare.info.⁸ The third-ranked result, from solarmovie.is, has been the subject of over 7,500 DMCA notices.⁹

⁶ See Liron Sivan, et al., *Do Search Engines Influence Media Piracy? Evidence from a Randomized Field Study* (Sept. 2014), available at <http://ssrn.com/abstract=2495591>.

⁷ Google Transparency Report (accessed Dec. 10, 2014), <http://www.google.com/transparencyreport/removals/copyright/search/?q=putlocker>.

⁸ Google Transparency Report (accessed Dec. 10, 2014), <http://www.google.com/transparencyreport/removals/copyright/search/?q=megashare>.

⁹ Google Transparency Report (accessed Dec. 10, 2014), <http://www.google.com/transparencyreport/removals/copyright/search/?q=solarmovie>.

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Google watch gravity

Web Videos News Shopping Images More Search tools

About 90,800,000 results (0.35 seconds)

 **Watch Gravity** 

 **Google Play** from \$9.99

 **VUDU** from \$9.99

 **Amazon** from \$3.99



Watch Gravity Online Free Putlocker | Putlocker - Watch ...
putlocker.is/watch-gravity-online-free-putlocker.html ▾
Watch Gravity (2013) Online Free Full Movie Putlocker. Astronauts attempt to return to Earth after debris crashes into their space shuttle, leaving them drifting ...

MEGASHARE.INFO - Watch Gravity Online Megavideo
megashare.info/full_watch.php?id=TnpNeE13PT0 ▾
Chapter: Full.

Watch Full "Gravity (2013)" Movie Online - SolarMovie
www.solarmovie.is/watch-gravity-2013.html ▾
Watch full "Gravity" (2013)" movie produced in 2013. Genres are Drama, Thriller, Sci-Fi.

The Impact of the Algorithm Change Seems Unduly Dependent Upon the Search Query

Even minor changes in search queries can dramatically affect the volume of piracy sites in search results, and which of those sites appear. A search for “theory of everything” – a film released in November – returns legitimate websites for all results on the first page.

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Google theory of everything

Web Videos News Images Books More Search tools

About 210,000,000 results (0.20 seconds)

Showtimes for The Theory of Everything

	Mon. Dec 15	Tue. Dec 16	Wed. Dec 17	Thu. Dec 18
All times	Morning	Afternoon	Evening	Night
E Street Cinema - Map	Standard 7:00pm 9:35			
AMC Loews Georgetown 14 - Map	Standard 6:30pm 9:20			
Regal Ballston Common 12 - Map	Standard 6:10pm			

All times are in ET

[More showtimes](#)

The Theory of Everything (2014) - IMDb

www.imdb.com/title/tt2980516/ - Internet Movie Database

★★★★ - Rating: 7.7/10 - 9,722 votes

The *Theory of Everything* -- A look at the relationship between the famous physicist Stephen Hawking and his wife Jane. The *Theory of Everything* stars Eddie Redmayne, Felicity Jones, and ...

Full Cast & Crew - Plot Summary - Trivia - Quotes

The Theory of Everything (2014 film) - Wikipedia, the free encyclopedia

[en.wikipedia.org/wiki/The_Theory_of_Everything_\(2014_film\)](http://en.wikipedia.org/wiki/The_Theory_of_Everything_(2014_film)) - Wikipedia

The *Theory of Everything* is a 2014 British biographical romantic drama film directed by James Marsh and adapted by Anthony McCarten from the memoir

Theory of everything - Wikipedia, the free encyclopedia

en.wikipedia.org/wiki/Theory_of_everything - Wikipedia

A *theory of everything* (ToE) or final theory, ultimate theory, or master theory is a hypothetical single, all-encompassing, coherent theoretical framework of

The Theory of Everything - Rotten Tomatoes

www.rottentomatoes.com/m/the_theory_of_everything/ - Rotten Tomatoes

★★★★ - Rating: 81% - 150 votes

Critics Consensus: Part biopic, part love story, *The Theory of Everything* rises on James Marsh's polished direction and the strength of its two leads.

In the news

 **Eddie Redmayne is Married: Theory of Everything Actor Weds Hannah Bagshawe in Candlelit Ceremony**

Us Magazine - 2 hours ago

Hannah Bagshawe and Eddie Redmayne *Theory of Everything* actor Eddie Redmayne

5 reasons why Eddie Redmayne (*Theory of Everything*) will win Best Actor Oscar

GoldDerby - 16 hours ago

Theory of Everything star Eddie Redmayne weds

KCTV Kansas City - 1 hour ago

[More news for theory of everything](#)

Official Site | The Theory of Everything | Movie Overview

www.focusfeatures.com/the_theory_of_everything - Focus Features

Story: Starring Eddie Redmayne (*Les Misérables*) and Felicity Jones (*The Amazing Spider-Man 2*), this is the extraordinary story of one of the world's greatest living

The Theory of Everything Reviews - Metacritic

www.metacritic.com/movie/the-theory-of-everything - Metacritic

★★★★ - Rating: 72% - 45 reviews

The *Theory of Everything* movie reviews & Metacritic score: Once a healthy, active young man, Stephen Hawking (Eddie Redmayne) received an

The Theory of Everything - Official Trailer (Universal Pictures ...)

www.youtube.com/watch?v=Saiz7uGp72c

Aug 6, 2014 - Uploaded by Universal Pictures UK

The Official Trailer for *The Theory of Everything* in Cinemas New Year's Day, 2015 <http://www>



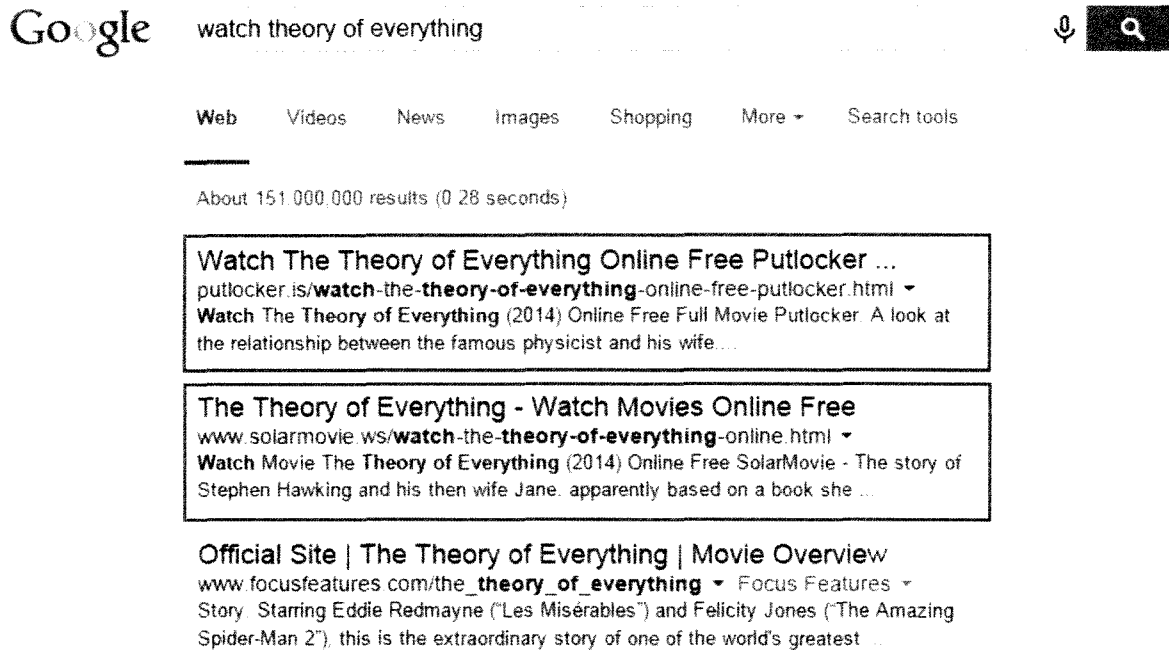
AMC Theatres: Theory of Everything

<https://www.amctheatres.com/movies/theory-of-everything> - AMC Theatres

Starring Eddie Redmayne (*Les Misérables*) and Felicity Jones (*The Amazing Spider-Man 2*), this is the extraordinary story of one of the world's greatest living

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With the addition of the word “watch” to the query, however, the results shift significantly. Suddenly, the top two results are for Putlocker and SolarMovie sites, which appear before the official site for the film.



Google Has the Ability to Meaningfully Combat Piracy

Although the MPAA appreciates that demoting sites with high numbers of DMCA notices can make a difference in traffic to the specific site at issue, it is apparent that Google’s approach has failed to address the core problem. As the above results show, despite the recent adjustment to Google’s search ranking algorithm, pirated content continues to appear above lawful sources for copyrighted works. In some cases, the specific websites appearing in the results may have changed, but the underlying problem has not. Google continues to direct users searching for copyrighted content toward illegal websites to view and download that content.

It has become clear that the manner in which Google exclusively relies on DMCA notices in its search rankings is flawed. It fails to eliminate illicit content from the top of search results, and it is burdensome to those whose content is being stolen. Under this system, content owners have to identify each infringing link, one-by-one, and send Google tens of millions of DMCA notices, year after year, just to get well-known pirate sites demoted. In the meantime, content theft continues. If Google is truly committed to helping its “users find legitimate, quality sources of

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content more easily,”¹⁰ as it says in its piracy report, then it should eliminate such websites from its search results entirely and ensure that authorized sources of content occupy the top of its search results. There is no legitimate reason why these sites must remain in the search rankings at all, much less at the top of them – particularly given that Google acknowledges that these sites are disseminating vast amounts of copyrighted content unlawfully and should be demoted, and that Google claims to be interested in promoting lawful content.

Google knows how to delist or significantly demote websites (as it does in a variety of contexts, including for sites that Google views as gaming its algorithm). In other areas of its business Google in fact has done exactly what it could and should do for Search. For example, when Google saw a business imperative to mitigate copyright infringement on its YouTube platform, Google developed digital fingerprinting technology that can accurately identify videos based on their visual properties. Likewise, Google claims to have taken steps to clean up its advertising business. In the same report in which Google announced its algorithm change for Search, Google wrote this about its advertising business:

Our policies prohibit infringing sites from using our advertising services. Since 2012, we have ejected more than 73,000 sites from our AdSense program, the vast majority of those caught by our own proactive screens.¹¹

Based on Google’s own statements, it has the ability to identify and take voluntary action against tens of thousands of piracy sites when it has the motivation to do so. (The advertisers that pay Google do not want their ads on these illicit sites.) It would seem beyond reasoned debate that if it wanted to Google could also prevent piracy links and sites from appearing in search results. Google is one of the most innovative technology companies in the world. The fact that piracy websites continue to appear at the top of the search rankings demonstrates that Google has much more that it can and must do.

I have attached a letter that MPAA Chief Executive Officer Chris Dodd sent to Google’s Chief Executive Officer and Co-Founder Larry Page. This letter acknowledges the positive step Google has taken, but explains that the algorithm change has failed to address the facilitation of unauthorized motion pictures and television programs through Search. This letter is part of our long-term goal of encouraging Google to meaningfully address the problem and of working with them to implement both effective and sustainable changes.

We believe it is important that you, your colleagues, as well as members of Congress and the President, see that our goal is to be positive when progress occurs, while also outlining what remains to be done to significantly reduce online illegal activity. Thus, as you consider the effects of Google’s recent algorithm change, we urge you to not lose sight of the broader context of the problem. Google has made a positive step, but only if it is part of a larger process to achieve an effective solution. If Google made these changes to its algorithm only to avoid

¹⁰ How Google Fights Piracy, at 18 (Oct. 17, 2014), <https://drive.google.com/file/d/0BwxyRPFduTN2NmdYdGdJQnFTeTA/view>.

¹¹ How Google Fights Piracy, at 4 (Oct. 17, 2014), <https://drive.google.com/file/d/0BwxyRPFduTN2NmdYdGdJQnFTeTA/view>.

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having to make the changes truly needed to meaningfully combat content theft, then the recent changes are in fact a step backwards.

We appreciate your attention to this matter. Please do not hesitate to contact me or my colleague, Vans Stevenson, to discuss these issues further.

Respectfully,

A handwritten signature in black ink, appearing to be 'SB' with a horizontal line extending to the right.

Steven B. Fabrizio

EXHIBIT C



MOTION PICTURE ASSOCIATION
OF AMERICA, INC.
1600 EYE STREET, NORTHWEST
WASHINGTON, D.C. 20006
(202) 293-1966

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Senior Executive Vice President
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202-378-9120
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January 14, 2015

Attorney General Jim Hood
Mississippi Attorney General's Office
P.O. Box 220
Jackson, MS 39205

Dear Attorney General Hood:

We welcome the invitation to provide input on specific measures Google can and should take to stop its facilitation of copyright infringement. We too feel strongly that the entire Internet ecosystem must work collaboratively to ensure a safe, secure and sustainable online environment. The consumer harms that lurk online, such as the sale and distribution of counterfeit drugs and consumer goods, can be mitigated if search engines are willing to be part of the solution. Your efforts to find solutions that protect consumers from crime online are commendable and essential.

Google has publicly stated that its antipiracy measures seek to "help[] users find legitimate, quality sources of content more easily."¹ Google's efforts to date, however, have fallen well short of achieving that important objective. Search results directing users to infringing material still consistently appear at the top of Google search results.

Ultimately, only Google knows the inner workings of its search engine, and Google must implement whatever measures are reasonably necessary to keep the first several pages of search results free of links to copyright infringing material. We believe the mitigation measures discussed below – if properly implemented by Google – should substantially achieve that objective, and also would help resolve the other important consumer protection issues underlying your investigation.

¹ Google, "How Google Fights Piracy," at 18 (2014), available at <https://drive.google.com/file/d/0BwxyRPFduTN2NmdYdGdJQnFTeTA/view?pli=1>.

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To achieve lasting results, we believe it is imperative that the Attorney General's office maintains a supervisory role to assess compliance and results, and to seek enhanced measures if these mitigation measures prove inadequate. Likewise, given the dynamic changes in search and online piracy, we also believe this process would work best if there were ongoing, collaborative research on effectiveness.

Mitigation Measures

1. Demotion/Promotion. Google should implement effective demotion of search results pointing to copyright infringing sites based on notices; with corresponding promotion of legitimate sites to ensure that other piracy sites do not rise to the top of search results to take the place of demoted sites. Google's current scheme is simply not effective. Effective in this context means, at a minimum, that:

- o The number of notices sufficient to trigger demotion must be low enough to be effective. Google should work with the Attorney General's office and affected parties to arrive at an appropriate notice threshold that might be based on, for example, the absolute number of notices received in a given time period and overall, the number of notices relative to the number of links on the site that are indexed by Google, and/or other factors such as, for example, whether a notice is for a movie still in theaters.
- o Demotion must not be dependent upon how the user frames the search query; if a site meets the thresholds for demotion, all search results for that site must be similarly demoted, regardless of the user search query.
- o Demotion must be substantial such that pirate sites are moved many pages down the search results, below all or most legitimate search results.
- o Legitimate sites (movie websites, IMDB, Wikipedia, authorized content, critical reviews, etc.) must be promoted such that legitimate sites – and not other pirate sites having fewer notices – rise in ranking to populate the first few pages of search results.

2. Delisting. Google should delist sites based on court orders directed at infringing sites or other comparable judicial determinations of infringement. Delisting in this context means that no results from a particular site would appear in any search results. Google has represented that it already complies with search engine delisting orders issued in cases against third party piracy sites.² That alone, however, is insufficient. While

² *Google v. Hood*, 3:14cv981-HTW, Dkt. No. 3, Mem. of Law, at 23, n.11 ("Google will remove links to a website from its search results upon receipt of a valid court order, an option that others have used. See, e.g., *Richemont Int'l S.A. v. Tony Chen*, No. 12-CV- 6689-WHP, Dkt. No. 51 (S.D.N.Y. Mar. 1, 2013) (order to disable and transfer Defendants' newly-detected domains).").


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Google should reaffirm its commitment to comply with such orders, Google additionally should commit to delist sites that are the subject of site-blocking or related orders from courts in the US and the EU, as well as those issued by any court of similarly competent jurisdiction.

3. Auto-Complete. Google should fix its auto-complete function so that it does not guide users to search queries for infringing content or sites.

We appreciate your attention to this matter. Please do not hesitate to contact me or my colleague, Vans Stevenson, to discuss these issues further.

Respectfully,

A handwritten signature in black ink, appearing to be 'SB' with a large, sweeping horizontal stroke extending to the right.

Steven B. Fabrizio